

(Stipulating Parties Listed on Signature Pages)

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

**In re: CATHODE RAY TUBE (CRT)
ANTITRUST LITIGATION**

Case No. 07-5944 SC

MDL No. 1917

This Document Relates to:

**STIPULATION AND [PROPOSED]
ORDER REGARDING SCHEDULING**

ALL INDIRECT PURCHASER ACTIONS

Electrograph Sys., Inc. v. Hitachi, Ltd., No. 11-cv-01656;

Siegel v. Hitachi, Ltd., No. 11-cv-05502;

Best Buy Co., Inc. v. Hitachi, Ltd., No. 11-cv-05513;

Target Corp. v. Chunghwa Picture Tubes, Ltd., No. 11-cv-05514;

Interbond Corp. of Am. v. Hitachi, Ltd., No. 11-cv-06275;

Office Depot, Inc. v. Hitachi, Ltd., No. 11-cv-06276;

CompuCom Sys., Inc. v. Hitachi, Ltd., No. 11-cv-06396;

Costco Wholesale Corp. v. Hitachi, Ltd., No. 11-cv-06397;

P.C. Richard & Son Long Island Corp. v. Hitachi, Ltd., No. 12-cv-02648;

Schultze Agency Servs., LLC v. Hitachi, Ltd., No. 12-cv-02649;

Tech Data Corp. v. Hitachi, Ltd., No. 13-cv-00157;

Sharp Elecs. Corp. v. Hitachi, Ltd., No. 13-cv-01173;

Dell Inc. v. Hitachi Ltd., No. 13-cv-02171;

Sharp Elecs. Corp. v. Koninklijke Philips Elecs. N.V., No. 13-cv-02776.

WHEREAS, Indirect Purchaser Class Plaintiffs (“IPPs”), the Direct Action Plaintiffs (“DAPs”), and Defendants agree that a modification to the existing expert discovery schedule will aid in the efficient resolution of this litigation;

WHEREAS, the proposed modification will change the existing deadlines for serving expert reports, but will not change the existing fact discovery deadline (September 5, 2014) or the trial date (March 9, 2015) in this litigation;

IT IS HEREBY STIPULATED AND AGREED by and between counsel for the IPPs, DAPs, and counsel for the undersigned Defendants¹ in the above-captioned actions as follows:

SCHEDULE

March 25, 2014*	Last day for IPPs and DAPs to serve opening expert reports on the merits; last day for Defendants to serve opening expert reports on affirmative defenses;
June 24, 2014*	Last day for Defendants to serve opposition expert reports on the merits; last day for IPPs and DAPs to serve opposition expert reports on affirmative defenses;
August 5, 2014	Last day for IPPs and DAPs to serve rebuttal expert reports on the merits; last day for Defendants to serve rebuttal expert reports on affirmative defenses;
September 12, 2014	Last day for IPPs, DAPs and Defendants to serve sur-rebuttal reports to any expert they are opposing and who serves a rebuttal report;

¹ The following entities do not join in this stipulation: Technicolor SA (f/k/a Thomson SA), Technicolor USA, Inc. (f/k/a Thomson Consumer Electronics, Inc.), Mitsubishi Electric Corporation, Mitsubishi Digital Electronics America, Inc., and Mitsubishi Electric US, Inc. (f/k/a Mitsubishi Electric and Electronics, USA, Inc.). In addition, on August 1, 2013, Special Master Legge entered an Order (Dkt. No. 1820) staying discovery against Thomson Consumer Electronics, Inc., so it is not participating in discovery.

All parties reserve the right to seek modification of the schedule based on the number of expert reports, which is presently unknown.

The undersigned Parties jointly and respectfully request that the Court enter this stipulation as an order.

PURSUANT TO STIPULATION, IT IS SO ORDERED.

Dated: _____

Hon. Samuel Conti
United States District Judge

DATED: December 23, 2013

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Pursuant to Local Rule 5-1(i), the filer attests that the concurrence in the filing of this document has been obtained from each of the above signatories.